

1 DANIEL G. BOGDEN  
United States Attorney  
2 District of Nevada  
Nevada Bar No. 2137  
3 CARLOS A. GONZALEZ  
Assistant United States Attorney  
4 333 South Las Vegas Blvd. Suite 5000  
Las Vegas, NV 89101  
5 Tel: (702) 388-6336  
Fax: (702) 388-6787  
6 Email: Carlos.Gonzalez2@usdoj.gov  
Attorneys for Defendant  
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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 EVE T. MANDELL,

11 Plaintiff,

12 v.

13 CAROLYN W. COLVIN,  
Acting Commissioner of Social  
14 Security,

15 Defendant.

Case No.: 2:13-CV-00012-GMN-PAL

16 **UNOPPOSED MOTION FOR EXTENSION OF TIME**  
17 **(First Request)**

18 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security  
19 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Carlos A.  
20 Gonzalez, Assistant United States Attorney, to request that this Court extend the time to respond to  
21 Plaintiff's Motion for Reversal and/or Remand. This is Defendant's first request for an extension of  
22 time. Plaintiff's counsel was contacted on July 16, 2013, and Plaintiff does not oppose Defendant's  
23 motion. Defendants' current deadline is July 17, 2013.

24 The instant request is not intended to cause delay and is necessary because Defendant needs  
25 additional time to consider the issue involved in this case and because of the heavy workload of  
26 Defendant's attorney assigned to this case. Defendant's counsel has completed a draft of Defendant's

1 Cross-Motion to Affirm; however, Defendant needs additional time to complete the internal agency  
2 review process. In addition, counsel assigned to this case has three additional District Court briefs due  
3 within a week of the deadline in this case, in addition to other agency matters.

4 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of  
5 time to respond to Plaintiff's motion, up to and including August 16, 2013.

6 Dated: July 17, 2013.

7 Respectfully submitted

8 DANIEL G. BOGDEN  
9 United States Attorney

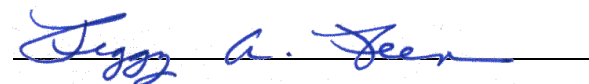
10 /s/ Carlos A. Gonzalez  
11 CARLOS A. GONZALEZ  
Assistant United States Attorney

12 OF COUNSEL:

13 DONNA L. CALVERT  
Acting Regional Chief Counsel

14 ELLINOR R. CODER  
15 Assistant Regional Counsel  
16 Social Security Administration

17  
18 IT IS SO ORDERED:

19   
20

21 UNITED STATES DISTRICT JUDGE  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: \_ July 22, 2013 \_  
24  
25  
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**CERTIFICATE OF SERVICE**

I, Carlos A. Gonzalez, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

**CM/ECF:**

Marc V. Kalagian, Esq.  
Rohlfing & Kalagian, LLP  
211 East Ocean Boulevard, Suite 420  
Long Beach, CA 90802  
Email: marc.kalagian@rksslaw.com

Dated this 17th day of July, 2013

/s/ Carlos A. Gonzalez  
CARLOS A. GONZALEZ  
Assistant United States Attorney